

S/N 10/038,766  
Ref. No.: 659-919

Schroth. Applicants gratefully acknowledge the Examiner's statement that all other claims are allowable.

With respect to claim 21, Applicants note that the Examiner previously rejected claims 1, 2, 4-6 and 9-16 as being anticipated by Schroth in an Office Action dated October 6, 2003. In response (*see* January 8, 2004 Amendment), Applicants amended claim 1 and added claim 21 to depend from claim 1. In particular, Applicants amended claim 1 to clarify that the "outer surface [includes] a generally *convex* top portion and a generally *convex* recessed portion spaced inwardly from said top portion." Applicants later amended claim 21 to include those same recitations.

In contrast, as shown in Schroth, the surface 119 of the platen means 32 is substantially planar, not curved, and even the grooves 116 and 118 are either *planar or concave* in shape (*see* end 106 – Figure 6), not *convex* as recited in claim 21.<sup>1</sup> Moreover, the grooves 116 and 118 of Schroth are not "adapted and configured to engage at least one portion of the discrete part," as recited in claim 21, but rather are merely provided to distribute a vacuum pressure (Col. 5, lines 42-45).

For all of these reasons, Applicants submit that claim 21 is allowable over Schroth.

Applicants further note that the Examiner *withdrew her prior rejection* of claim 1 over Schroth, and *did not previously reject claim 21 over Schroth* when newly presented, in response to these same arguments. In addition, the relatively minor amendment made to claim 21 in the Amendment filed March 21, 2005 had nothing to do with Schroth and could not possibly have led to this new rejection over Schroth. Accordingly, Applicants further submit, to the extent that this case is not in condition

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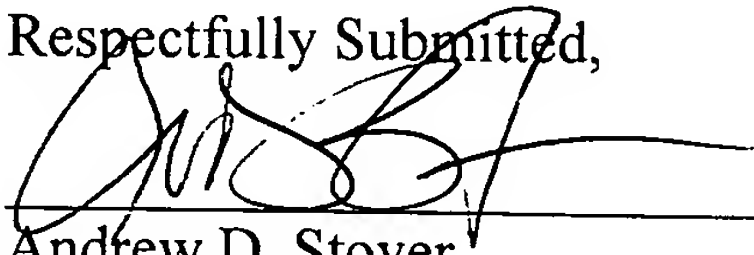
<sup>1</sup> Applicants note that whether or not the surface of the roll 4 is convex is irrelevant, since only the platen means 32 rotates about an axis substantially normal to the bottom surface of the recessed portion as recited in claim 21.

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for allowance, that the finality of this Office Action should be withdrawn (MPEP 706.07).

No fees are believed to be due in connection with this Response. If for any reason this application is not considered to be in condition for allowance and an interview would be helpful to resolve any remaining issues, the Examiner is respectfully requested to call the undersigned attorney at (312) 321-4713.

Dated: October 27, 2005

Respectfully Submitted,  
  
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